

ORIGINAL
FILE

RECEIVED

APR - 8 1991

RECEIVED BY

APR 8 1991

FCC MAIL BRANCH

MOTOR CITY RADIO CLUB, INC
PO BOX 337
WYANDOTTE, MI 48192
APRIL 5, 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Secretary
Federal Communications Commission
Washington, DC 20554

Formal comments on RM-7649

In the Matter of

Amendment of Part 97 of the Commission's Rules
Concerning responsibility for the content of all automatically
re-transmitted signals in the Amateur Radio Service.


The Motor City Radio Club has represented amateur radio operators in south eastern Michigan since 1932 and has members active in all aspects of the service. Membership concern has been voiced regarding the responsibility of the licensee of repeater stations for the content of re-transmitted signals through the repeater. The club was about to petition for a change in FCC rules in this matter when it was learned that RM-7649 had been filed. These comments are to be considered to be in support of RM-7649.

The licensee and/or control operator of a repeater in the Amateur Radio Service should not be held primarily responsible for the content of the communications through the repeater but this responsibility should be that of the operator of the originating station. The operator of the repeater station can not be expected to censor the content of an improper message until it has already passed through the system. By then, it is too late. The violation has taken place and the repeater licensee had no way to control it. The originating operator is the only person who has complete control of the content of the message. This would be also the person who would presumably benefit from communications having pecuniary content. Certainly not the repeater licensee.

Secondary responsibility of the repeater licensee could mean that if a pattern of improper communications is perceived that it could be required that the repeater licensee seek solutions to eliminate the problem.

We believe that strict enforcement of the present rules can lead to the shutting down of repeaters because the licensees do not want to be held responsible for things over which they do not have complete control. This would mean the loss of a valuable resource for emergency and public service communications.

Comments adopted at the regular meeting of the Motor City Radio Club, Inc, April 5, 1991.


Richard St. Amant, W8PDV
President

cc:Tom Blackwell, N5GAR
Dallas, Texas

List A B C D E

No. of Copies rec'd

Material Distributed

046